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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CHRISTIAN LOVGREN and GINA
CUNEO, on behalf of the State of
California, as private attorneys general,

Plaintiffs,

v.

ENLOE MEDICAL CENTER, a
California; and Does 1 through 50,
Inclusive,

Defendants.

Case No. 2:24-cv-01133-WBS-DMC

**JOINT STIPULATION TO SET
BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION TO
REMAND CASE TO STATE COURT;
ORDER**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor

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8 Attorney for Defendant
9 ENLOE MEDICAL CENTER
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1 Plaintiffs CHRISTIAN LOVGREN and GINA CUNEO (“Plaintiffs”) and
2 Defendant ENLOE MEDICAL CENTER (“Defendant”) (collectively the “Parties”),
3 by and through their respective counsel of record, hereby stipulate and agree as
4 follows:

5 WHEREAS, on May 16, 2024, Plaintiffs filed and served their Notice of
6 Motion and Motion to Remand Case to State Court, which is set for hearing on
7 March 31, 2025 (Dkt. 15);

8 WHEREAS, the Parties settled the case after a private mediation on January
9 21, 2025, with experienced wage and hour mediator Steven Serratore; and

10 WHEREAS, to prevent the Parties from incurring further potentially
11 unnecessary litigation expenses while they finalize the Parties’ settlement, and in the
12 interests of judicial economy and the conservation of Party resources, the Parties
13 agree that good cause exists to further continue the briefing schedule for Plaintiffs’
14 Motion to Remand Case to State Court:

- 15 • The hearing on Plaintiffs’ Motion to Remand Case to State Court to be
16 continued from March 31, 2025, to April 28, 2025;
- 17 • Defendant’s opposition deadline to be continued to March 4, 2025; and
- 18 • Plaintiffs’ reply deadline to be continued to March 11, 2025.

19 NOW, THEREFORE, based upon the foregoing, the Parties, by and through
20 their respective undersigned counsel of record, hereby stipulate and agree as
21 follows:

22 1. The above recitals are an integral part of and provide the foundation for
23 this stipulation;

24 2. The briefing schedule for Plaintiffs’ Motion to Remand Case to State
25 Court is as follows:

- 26 a. The hearing on Plaintiffs’ Motion to Remand Case to State Court
27 to be continued from March 31, 2025, to April 28, 2025;

- b. Defendant's opposition deadline to be continued to March 4, 2025; and
- c. Plaintiffs' reply deadline to be continued to March 11, 2025.

IT IS SO STIPULATED.

Dated: February 4, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Sergio Julian Puche (Authorized on 2/4/2025)

Jeffrey S. Herman
Sergio Julian Puche
Trevor G. Moran

Attorney for Plaintiffs
CHRISTIAN LOVGREN and GINA CUNEO

Dated: February 4, 2025

LITTLER MENDELSON, P.C.

By: /s/ Barbara A. Blackburn

Barbara Blackburn
Douglas L. Ropel
Lauren J. Orozco

Attorney for Defendant
ENLOE MEDICAL CENTER

ORDER


By stipulation of the Parties, and for good cause shown, the Court hereby Orders as follows:

1. The briefing schedule for Plaintiffs' Motion to Remand Case to State Court is as follows:

- a. The hearing on Plaintiffs' Motion to Remand Case to State Court to be continued from March 31, 2025, to **April 28, 2025 at 1:30 p.m.;**
- b. Defendant's opposition deadline to be continued to **March 4, 2025;** and
- c. Plaintiffs' reply deadline to be continued to **March 11, 2025.**

IT IS SO ORDERED.

Dated: February 4, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE